

REMARKS

Reconsideration of this application, as amended, is requested.

Claims 1-3, 5, 6 and 8-14 remain in the application. Independent claims 1, 11, 13 and 14 have been amended slightly. These amendments are presented to address the comments raised in the Response to Arguments that were part of the Detailed Action of July 26, 2004. This minor rearrangement of words in the claims is not believed to raise new issues that would require further consideration or searching. Additionally, the Examiner's comments in paragraph 8 of the Detailed Action clearly indicate that the Examiner had considered this matter in the earlier searching and the earlier Office Actions. Accordingly, entry of this clarifying Amendment After Final Rejection is believed to be proper and is solicited.

Claims 1-3, 5, 6, 8, 11, 13 and 14 were rejected under 35 USC 103(a) as being obvious over Danielsson et al., U.S. Patent No. 6,429,578 considered in view of Sauli, U.S. Patent No. 6,011,265. Claims 9, 10 and 12 were rejected under 35 USC 103(a) as being obvious over Danielsson et al., in view of Sauli and further in view of Gleason, U.S. Patent No. 3,956,654.

The rejection appears to be based at least in part on the language employed in the claims prior to this amendment. In particular, the Examiner referred to applicant's earlier remarks and concluded that "the features upon which applicant relies (i.e. that only a single insulator layer is arranged between first and second conductive layers) are not recited in the rejected claims." The Examiner concluded, for example, that previously amended claim 1 "does not include a limitation where only a single insulator layer is arranged between first and second conductive layers. Therefore,

applicant's arguments are not persuasive." In this regard, the Examiner appears to have concluded that Danielsson et al. does have an insulator layer disposed between two conductive layers, even though Danielsson et al. also has a converter and a second insulator between the conductive layers. The Examiner's comments suggest that a clarification in this regard would be received favorably for distinguishing over Danielsson et al.

All of the claims have been amended to clarify that each converter has an insulator with opposite first and second surfaces. Each converter further has first and second conductive layers disposed respectively on the first and second surfaces of the insulator layer. Each converter then has a converter layer arranged on at least one of the first conductive layer and the second conductive layer to define an outer part of the respective converter device. This structure clearly is not taught or suggested by Danielsson et al.

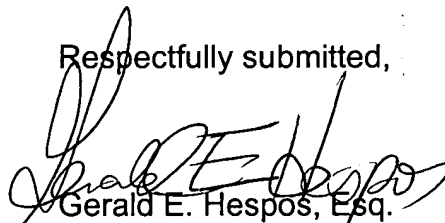
The rejection is based upon the hypothetical combination of Danielsson et al and Sauli. It is believed that the Examiner interpreted this hypothetical combination as having the conductor-insulator-converter-insulator-conductor arrangement of Danielsson et al. with an additional converter layer on the outside of one of the metal layers as allegedly taught by Sauli. It is believed that the Examiner interpreted the claims prior to this amendment as permitting the Danielsson et al. arrangement and then merely incorporated the Sauli outer converter layer onto the Danielsson et al. converter device. Counsel assumes that the Examiner did not envision a complete reconstruction of the Danielsson et al. where the Danielsson et al. converter and one Danielsson et al. insulator were removed from there disclosed

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position and repositioned onto an outer surface of one of the conductive layers. Hence, it is believed that the preceding amendments will have addressed the obviousness rejection raised in the Office Action. Nevertheless, it must be asserted that the hypothetical combination of Danielsson et al. and Sauli in a manner that would suggest the invention defined by the amended claims is extremely unlikely. In particular, Danielsson et al. is directed to a detector for detecting high energy x-rays (MeV), which can penetrate through rather thick material. Danielsson et al. discloses that the converter layer 708 has a thickness of about 150 μ m which is at least one order of magnitude thicker than the top metal layer 704 of 5 μ m. Sauli, on the other hand, relates to a device for detecting primarily low energy particles of radiation. Accordingly, the Sauli converter layer is very thin and has a thickness of only a few μ m. A person skilled in the field of applicant's invention would not think to use the Sauli device for detecting low energy particles or radiation in a Danielsson et al. detector for detecting high energy x-rays. The picking and choosing of components and then rearranging those components would be carried out only with the benefit of hindsight gleaned from the subject application.

In view of the preceding amendments and remarks, it is submitted that the claims are directed to patentable subject matter and allowance is solicited. The Examiner is urged to contact applicant's attorney at the number below to expedite the prosecution of this application.

Respectfully submitted,



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